

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BRAM VAN BOXTEL, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

TENET FINTECH GROUP INC. F/K/A
PEAK FINTECH GROUP INC.,
JOHNSON JOSEPH, and JEAN
LANDREVILLE,

Defendants.

Case No. 1:21-cv-06461-PKC-RLM

**NOTICE OF DONALD DOMINIQUE'S MOTION FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Donald Dominique (“Dominique”) respectfully moves this Court for an order: (1) appointing Dominique as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Dominique’s selection of Glancy Prongay & Murray LLP as Lead Counsel for the class; and (3) granting such other relief as the Court may deem to be just and proper (the “Motion”).

Dominique seeks appointment as lead plaintiff and approval of his choice of counsel pursuant to the Exchange Act and the PSLRA. This motion is based on this notice, the attached memorandum of law, the declaration of Gregory B. Linkh, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Dominique is aware of this Court’s Individual Practice Rule 3.D., which encourages parties not to file their motion papers until the motion has been fully briefed. However, the Exchange Act requires that lead plaintiff motions be filed no later than 60 days after the date notice of the action was first published. In this case, notice was published on November 19, 2021. Accordingly, lead plaintiff motions must be filed no later than January 18, 2022. *See* 15 U.S.C. § 78u-4(a)(3)(A)(i). Moreover, Dominique will not know who else plans to move for appointment as lead plaintiff (if anyone) until after all the deadline has passed and all movants have filed their respective motions. As such, Dominique respectfully requests that the Court waive the requirements of Rule 3.D.

Respectfully submitted,

DATED: January 18, 2022

GLANCY PRONGAY & MURRAY LLP

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*Counsel for Donald Dominique and Proposed
Lead Counsel for the Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 18, 2022, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 18, 2022, at New York, New York.

/s/ *Gregory B. Linkh*
Gregory B. Linkh